

Direct Certification

Overview

Direct Certification (DC) involves matching school enrollment records against the most current available Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Families in Idaho (TAFI), Foster Care data, or through several other allowable categorically eligible designations. Direct Certification is a statutory mandate pursuant to Section 9 of the Richard B. Russell National School Lunch Act (NSLA) as amended by reauthorization legislation (Public Law 108-265). Direct Certification for Sponsors that operate the National School Lunch Program (NSLP), School Breakfast Program (SBP) and/or Special Milk Program (SMP) that accept applications **must** be run three times each year (this is not optional):

- At or around the beginning of the school year
- Three months after the first run
- Six months after the first run

Maintaining a process for directly certifying students is a United States Department of Agriculture (USDA) mandated regulation for Child Nutrition Programs. For additional information, please see the Idaho State Department of Education (SDE) Direct Certification webpage for a downloadable version of the DC manual, listed under the Direct Certification section in the Additional Resource link.

Terminology

Categorical eligibility – Those children approved without an application to receive free school meals. A child is categorically eligible for free school meals if they are: in foster care; enrolled in Head Start; homeless or migrant; living in a household receiving SNAP, Food Distribution Program on Indian Reservations (FDPIR), and/or TAFI benefits and they are certified by the Homeless or Migrant Liaison or are a match on the Direct Certification list.

Direct certification (DC) – A method in which a child is eligible for free meals based on documentation obtained directly from the appropriate State or local agency authorized to certify that the child is a member of a household receiving assistance under SNAP, FDPIR or TAFI programs, and/or is a Foster, Homeless, Migrant, Head Start, or Runaway child.

Overt identification - Any action that may result in a child being recognized as potentially eligible to receive or be certified for free or reduced price school meals or free milk.

Point of Service (POS) - The point in the food service operation where a determination can accurately be made that a reimbursable free, reduced price, or paid lunch has been served to an eligible child.

What is Direct Certification?

Under direct certification, information from the State food stamp or welfare agency is used to directly certify children receiving SNAP/TAFI/FDPIR/FOSTER benefits without requiring them to complete certification applications. Direct certification was designed primarily to improve program access and administrative efficiency. Any School Food Authority (SFA) administering the NSLP, SBP, and/or SMP has specific responsibilities related to Direct Certification.

System Rules and Regulations

There must be a legitimate “need to know” in regards to who has access to student data through the SDE Direct Certification system. Even if a program or person is authorized to view or receive free and reduced price eligibility information, access must be limited to individuals directly connected with administration or enforcement of a federal or State program or activity; our system is to be accessed only for the purpose of directly certifying a child for free meals. For this reason the following measures must be **strictly** followed:

- Passwords are not to be shared with anyone or to be accessed by anyone.
- If more than one password is needed, please contact the state agency.
- Passwords are strictly confidential and only for the user selected by the district.
- Do not share this information with anyone.
- If a user login or password is shared and the State agency discovers it, the offender will be immediately removed from the system.

Maintaining the confidentiality of a child’s eligibility status is of the highest importance. There may be no discrimination or different treatment of children receiving free meal benefits resulting from Direct Certification of the student. The following must be adhered to at all times:

- The names of children cannot be published, posted, or announced in any manner or used for any purposes other than determining and verifying eligibility for free meals.
- Children cannot be required to work for their meals.
- Children cannot be required to use a separate dining room, separate serving line, or separate serving time based on their eligibility status.

The above examples would allow “overt identification” of students who receive free meal benefits. Overt identification can be a challenge at the Point of Service (POS), as children may need to provide money and/or a fund balance may be visible on a computer screen if an electronic POS system is being used. Schools must ensure to the maximum extent practicable, that the method of payment or POS system does not result in children being inadvertently identified as receiving free meal benefits.

Why is Direct Certification Important?

Direct certification increases access to school meals for students eligible for the National School Lunch Program (NSLP) and School Breakfast Program (SBP). It also decreases burden on families and district staff by limiting the amount of paperwork they must prepare and process.

Resources

Additional resources may be available for this topic. Please check the Idaho School Nutrition Reference Guide website for copies of manuals, user guides and helpful links to relevant subject matter.